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VIA CM/ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: Miranda, et al. v. Grace Farms, Inc., et al
SDNY Case No.: 1:16-cv-1369

Dear Judge Broderick:

This office represents the Defendants, Grace Farms, Inc. d/b/a City Café, Unak Grocery Corp. d/b/a Liberty Café, Rajni Singhal, and Vivek Singhal in the above-captioned case. We submit this joint letter regarding the postponement of discovery, in light of a more recently-filed case against Defendants by different plaintiffs, who also purport to assert claims under the FLSA and related laws, also pending before Your Honor, Docket No. 16-cv-7704, *Amaro et al v. Unak Grocery Corp., et al.*

The Court issued an Order, dated November 15, 2016 (DE #30), directing the parties to address the potential consolidation of these actions, in which the plaintiffs in the newer action are being represented by different counsel. The responses are due this Friday, December 2, 2016.

On October 26, 2016, the parties in this case requested a first extension of time to complete discovery until January 23, 2017, (DE #26) which was granted by the Court. (DE #27). Since that time, the parties had tentatively scheduled depositions, which did not go forward due to scheduling conflicts. But at this time, given the potential consolidation of the actions, the parties have mutually agreed to wait until that issue is resolved before proceeding with depositions, as it remains uncertain which of plaintiffs' counsel will continue to be involved in the case or cases as they go forward.

If the Court pleases, the parties to this case will promptly submit a second request for an extension of time to complete discovery, together with a revised proposed case management scheduling order. However, we believe it may be more advisable to simply wait until such time as a potential consolidation, and its attendant issues, are resolved by the Court.

We thank the Court for your time and consideration in this matter.

Respectfully Submitted,

Law Offices of Nolan Klein, P.A.

By: Valerie K. Ferrier
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cc: Helen F. Dalton, Esq., Roman Avshalumov, Esq.
and James O'Donnell, Esq. (via ECF)